

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO: 1:23-cv-22312-RNS

CINTHIA LIZ PARI CAHUANA,
an Individual,

Plaintiff,

v.

SUPER AUTOS DORAL LLC.,
a Florida limited liability company,
and WESTLAKE SERVICES, LLC, d/b/a
WESTLAKE FINANCIAL SERVICES,
a foreign entity,

Defendants.

_____ /

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Westlake Services, LLC dba Westlake Financial ("Westlake"), by and through its undersigned attorneys, hereby respectfully moves this Court for the entry of an order providing Westlake up to and including July 28, 2023 to respond to Plaintiff's Complaint and states as follows:

1. Plaintiff filed this action on June 22, 2023.
2. On June 23, 2023, Plaintiff served the complaint on Westlake. Accordingly, Westlake's response was due on or before July 14, 2023.
3. Undersigned counsel was retained in connection with this matter prior to the filing of the complaint in connection with responding to a pre-litigation demand letter from the Plaintiff.
4. However, Westlake inadvertently did not forward a copy of the summons and complaint after it was served to undersigned counsel.

5. On July 24, 2023, counsel for Plaintiff advised undersigned counsel that Westlake had been served and that the deadline to respond to the complaint had elapsed.

6. Immediately upon learning of the filing of this lawsuit, undersigned counsel appeared in this case on July 24, 2023 and conferred with counsel in connection with seeking an extension of time.

7. Undersigned counsel requires a brief extension of time until July 28, 2023 to respond to the complaint due to several depositions and court appearances undersigned counsel has during the coming week.

8. In light of the foregoing, undersigned counsel submits that there is good cause for the requested extension.

WHEREFORE, undersigned counsel requests a brief extension of time – up to and including July 28, 2023, to file Westlake’s response to the Plaintiff’s Complaint.

DATED: July 24, 2023.

Respectfully submitted,

/s/ James R. Liebler, Esq.

JAMES R. LIEBLER II

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Attorneys for Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of July, 2023, I electronically caused the foregoing document to be filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served on this day on all counsel of record in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ James R. Liebler, II

JAMES R. LIEBLER II